

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BRENDA COGHLAN, §
§
§
Plaintiff, §
§
V. § C.A. No. 4:12-cv-2703
§
BLUE CROSS AND BLUE SHIELD OF §
TEXAS, A DIVISION OF HEALTH §
CARE SERVICE CORP., A MUTUAL §
LEGAL RESERVE COMPANY, AN §
INDEPENDENT LICENSEE OF THE §
BLUE CROSS AND BLUE SHIELD §
ASSN., §
§
Defendant. §

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE FIRST AMENDED
COMPLAINT**

To the Clerk of the Court and all parties of record:

On August 7, 2012, Mrs. Coghlan filed suit against the Defendants herein seeking damages related to the wrongful denial of her claim for emergency maternity care covered under a policy of insurance issued by Defendants.

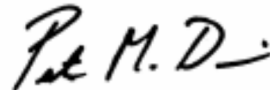
Plaintiff respectfully requests an order of the court granting her leave to file a First Amended Complaint, pursuant to Fed. R. Civ. P. 15.

Fed. R. Civ. P. 15(a) holds that even where amendment is not a matter of right, leave to amend shall “be freely granted when justice so requires.” Leave to amend at this time is in the interest of justice and will not work a delay or prejudice in this matter.

Defendants are not opposed to the relief sought in this motion.

Therefore, Plaintiff prays that her motion be granted and for such other and further relief to which she may be justly entitled.

Respectfully submitted,
DOYLE RAZNER LLP



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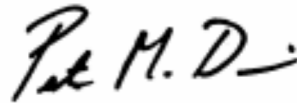
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I, the undersigned attorney, do hereby certify that a true and correct copy of the foregoing document was forwarded to the following counsel of record on this the 9th day of May, 2013, via CM/ECF, hand delivery, overnight courier, U.S. Mail, certified mail, return receipt request, or facsimile, pursuant to the Federal Rules of Civil Procedure:

Andrew F. MacRae
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Austin, TX 78746

ATTORNEYS FOR DEFENDANTS

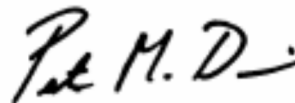


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PATRICK M. DENNIS

CERTIFICATE OF CONFERENCE

I hereby certify that on the 8th day of May, 2013, Plaintiff's counsel conferred with Counsel for Defendants, and Defendants are unopposed to the relief sought in this motion.



A handwritten signature in black ink, appearing to read "Pat M. Dennis", written in a cursive style.

Patrick M. Dennis